

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DAVID GOODRICH and	)	
COURTNEY GOODRICH,	)	
Individually and as Next Friends of	)	
ASHER LUKE GOODRICH, a minor,	)	
	)	
Plaintiffs,	)	CIVIL ACTION FILE NO.
	)	
v.	)	1:16-CV-03116-TWT
	)	
FISHER-PRICE, INC.,	)	
	)	
Defendant.	)	
	)	

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**MOTION FOR SUMMARY JUDGMENT ON BEHALF  
DEFENDANT FISHER-PRICE, INC.**

Pursuant to Federal Rule of Civil Procedure 56(a), and Local Rule 56.1, Defendant Fisher-Price, Inc. (“Fisher-Price”) respectfully moves this Court for an order granting summary judgment on all claims brought against it by Plaintiffs David Goodrich and Courtney Goodrich, individually and as next friends of Asher Luke Goodrich, a minor. Summary judgment in Fisher-Price’s favor is proper because the record evidence establishes that no genuine dispute exists as to any material fact with respect to Plaintiffs’ claims, and Fisher-Price is entitled to

judgment as a matter of law. This Motion is supported by the following documents, which are filed herewith:

1. Defendant's Memorandum of Law in Support of its Motion for Summary Judgment;
2. Defendant's Separate Statement of Material Facts to Which There is No Genuine Issue to be Tried, along with accompanying exhibits; and
3. All pleadings and discovery taken to date.

Respectfully submitted this 30<sup>th</sup> day of April, 2018.

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### **CERTIFICATE OF COMPLIANCE**

In accordance with Local Rule 7.1D, this is to certify that this brief has been prepared with one of the fonts and points approved by the Court in LR 5.1B, i.e., 14 point, Times New Roman font, and that the brief does not contain more than 10 characters per inch of type .

This 30<sup>th</sup> day of April, 2018.

/s/ Richard K. Hines, V  
Richard K. Hines, V  
Georgia Bar No. 356300

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically served this **DEFENDANT FISHER-PRICE, INC.'S MOTION FOR SUMMARY JUDGMENT** upon the following counsel of record:

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This 30<sup>th</sup> day of April, 2018.

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